

Representation

Draft Modification Report

0385: Inclusion of DNOs as Users in User Pays Arrangements

Consultation close out date: 16 November 2011
Respond to: enquiries@gasgovernance.co.uk
Organisation: **Wales & West Utilities Ltd**
Representative: Simon Trivella
Date of Representation: 16 November 2011

Do you support or oppose implementation?

Neutral

Please summarise (in one paragraph) the key reason(s) for your support/opposition.

Wales & West Utilities (WWU) believes that the ability to classify Distribution Networks as a 'User' for User Pays already happens and this modification is unnecessary. Recent examples of where this has been demonstrated are modification proposal 0381 and proposals 0376/0376A. However, we do not believe that implementation of this modification would have any detrimental impacts.

Are there any new or additional issues that you believe should be recorded in the Modification Report?

We have not identified any new issues.

Self Governance Statement:

Do you agree with the Modification Panel's decision that this should be a self-governance modification?

We are in agreement with the Modification Panel that this proposal should be treated as a self-governance modification.

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

We do not believe that implementation would have any impact (negative or positive) on the achievement of the relevant objectives and disagree with the points mentioned in the Draft Modification Report.

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Impacts and Costs:

What analysis, development and ongoing costs would you face if this modification were implemented?

No costs have been identified.

Implementation:

What lead-time would you wish to see prior to this modification being implemented, and why?

We have no preference for an Implementation date and believe that on a short lead-time would be required.

Legal Text:

Are you satisfied that the legal text will deliver the intent of the modification?

We are satisfied with the legal text provided within the DMR.

Is there anything further you wish to be taken into account?

Please provide any additional comments, supporting analysis, or other information that that you believe should be taken into account or you wish to emphasise.

We have nothing further that we wish to be taken into account.